

**AMENDMENT TO FACT SHEET**  
**Permit No. ST-7425**  
**J. H. Baxter - Arlington, Washington**  
**Modification date: April 23, 2003**

*The following modification has been made to the permit as a result of the permit appeal settlement and the completion of requirements contained in Order No. DE00WQNR-850.*

**PERMIT**

Former french drains (FD) No. 13, 14, 23, 24, 25 and 26 have been closed as required in the above referenced Order. For monitoring purposes, the facility has installed three new lysimeter samplers in the treated wood storage area. These lysimeter samplers were installed in the vadose zone, near the gravelly sand and sand interface above the seasonal high water table and capillary fringe of the treated wood area, to collect stormwater infiltration through the unsaturated zone.

The lysimeter locations depicted on Figure 3 are as follows:

- Lysimeter L-1 is located in the ditch adjacent to former FD #24;
- Lysimeter L-2 is located in the east-west section of the ditch where former FD #13 and 14 were located;
- Lysimeter L-3 is located in the center of the north-south ditch on the west side of the treated product storage area, nearby former FD#23.

**S1.B Interim Effluent limits for Treated Product Storage Area Stormwater (page 5)**

The first line will be replaced with the following language: “the compliance point shall be the lysimeters where stormwater infiltrates to ground. The three lysimeter locations are as follows.” The above lysimeter locations description will be listed here.

The interim compliance schedule will be changed from August 31, 2002 to February 28, 2004, in order to allow adequate time to complete the design and construction of the proposed full scale wastewater treatment system.

The oil & grease limitation of 10 mg/L will be replaced with a total petroleum hydrocarbon-diesel (TPH-D) limitation of 0.5 mg/L. The facility uses P-9 base-oil which contains diesel as carrying oil for the pentachlorophenol treatment solution. Due to this fact, it is appropriated to monitor TPH-D in stormwater as opposed to the previous requirement of oil & grease.

S1.B.2 Final Effluent Limits for Treated Product Storage Area Stormwater (page 6)

The compliance date will be changed from September 1, 2002 to March 1, 2004. The discharge location will be referenced to the newly constructed wetlands. The language in this section will be changed to read as follows: “the Permittee is authorized to discharge treated stormwater to the wetlands which is currently being constructed in the southeast corner of the untreated wood storage area. Point of compliance shall be after treatment prior to discharge to the wetlands.”

The oil & grease limitation of 10 mg/L will be replaced with a total petroleum hydrocarbon-diesel (TPH-D) limitation of 0.5 mg/L.

Footnote b, third line, the term “International Toxicity Equivalency Factors” will be replaced with “1998 World Health Organization Toxicity Equivalency Factors.”

Footnote b, tenth line, the term “below its minimum quantitation level” will be replaced with “not detected” for clarification, and the word “shall” will be replaced with “may.”

S1.C.1 Interim Effluent Limits for Untreated Wood Storage Area Stormwater (page 6)

The interim compliance date will be changed from August 31, 2002 to February 28, 2004.

S1.C.2 Final Effluent Limits for Untreated Wood Storage Area Stormwater (page 7)

The final compliance date will be changed from September 1, 2002 to March 1, 2004.

Footnote b, tenth line, the term “below its minimum quantitation level” will be replaced with “not detected” for clarification, and the word “shall” will be replaced with “may.”

S2.A. Monitoring Schedule for the Treated Product Storage Areas, Parcel A (page 8)

The first sentence of the first paragraph has been modified to read "During the interim compliance period, stormwater samples shall be collected from the three lysimeter locations in the treated product storage area as depicted on Figure 3."

The following paragraph will be added to this section which reads: “Beginning March 1, 2004, and lasting through the expiration date, stormwater samples shall be collected after treatment prior to discharge to the wetlands.”

The monitoring type for flow will be changed from grab to estimated, to correct an error made in the previous permit.

The monitoring parameter oil & grease will be replaced with a parameter total petroleum hydrocarbon-diesel (TPH-D).

Footnote 5 (page 8), second line: The term ITEF will be replaced with the term “the 1998 World Health Organization TEF.” Third line: The word “shall” will be replaced with “may.”

S2.B. Monitoring Schedule for the Untreated Wood Storage Areas, Parcel B (page 9)

Since all the french drains in the untreated wood storage area have been closed. The first paragraph will be replaced with the following language: “During the interim compliance period and before the completion of the constructed wetland, at least two stormwater samples shall be collected from the wetlands pilot channel. After the completion of the constructed wetlands, other than the water collected in the approved wetland, all standing water in the untreated wood storage area shall be routed to the wastewater treatment system.”

In addition, the following paragraph will be added to this section which reads: “Beginning March 1, 2004, and lasting through the expiration date, stormwater samples shall be collected after treatment prior to discharge to the wetlands.”

The monitoring type for flow will be changed from grab to estimated, to correct an error made in the previous permit.

Footnote 4: The first sentence of footnote 4 will be changed to read “the sampling frequency for the untreated product (white wood) storage area shall be once every three months for the September through May period (3 samples per year per sample location as specified above).”. This change was necessary in order to be consistent with the frequency specified in the table in S2.B and the fact sheet.

S2.C. Ground Water Monitoring (page 10)

As part of the permit appeal settlement for stormwater monitoring in the treated product storage area, the Permittee has agreed to monitor at least three additional monitoring wells (HCMW-5, 6, and 7), in order to track the contaminated groundwater plume. The second sentence of the first paragraph will be changed to read as follows: "The Permittee shall monitor BXS-1 through 4, MW-1 through 3, HCMW-5, 6 and 7 according to the following schedule. Ground water at each monitoring well shall be sampled, analyzed and reported separately. These wells are depicted on Figure 3”.

The monitoring frequency listed in the table of S2.C.1 and 2 will be modified to reflect the following. For both field and laboratory monitoring, the monitoring frequency for wells BXS-2 through 4, MW-1, and 2 will remain biannual (twice a year). The monitoring frequency for wells BXS-1, MW-3, 10, 15, HCMW-5, 6 and 7 is proposed to be quarterly for the following parameters: pH, conductivity, water level, temperature, redox potential, dissolved oxygen, calcium, magnesium, sodium, potassium, iron, PCP, and total suspended solids. The monitoring frequency for dioxin/furan for all wells will be remaining biannual.

Footnote 2, second line: The term “ITEF” will be replaced with “WHO (1998) TEFs.”

Third line: The word “shall” will be replaced with “may.”

S5. Spill Plan

The submittal date will be changed from November 30, 2000 to December 31, 2003.

S6.A Schedule of Compliance

First paragraph, first line: The submittal date will be changed from March 15, 2002 to September 10, 2002. Third line: The term “RI/FS study” will be changed to “clean up activities.” Fourth line: The term “MTCA Agreed Order” will be changed to read “EPA Administrative Order on Consent (AOC), docket No. RCRA-10-2001-0086.” The last sentence of the first paragraph will be removed.

Second Paragraph, second line: The term “MTCA Agreed Order” will be changed to read “EPA-AOC.”

These changes are necessary for clarification. The submittal date is extended in order to allow adequate time for the facility to include all findings resulting from the on-going cleanup with EPA, and to ascertain the final management and treatment solution for the contaminated stormwater.

S6.B First line: The construction completion date will be changed from August 31, 2002 to August 31, 2003. Second line: the term “pavement work” will be changed to read “grading, capping, and...”. The reason for these proposed changes are the same as mentioned above.

S8.A Third line of the first paragraph: the term “french drain” will be changed to read “lysimeter.” All french drains on-site have been closed. Three lysimeter samplers have been installed in the treated wood storage area for monitoring purposes.

S10.F Best Management Practices

The second sentence of item F has been removed in order to be consistent with the language in the above referenced Order.

**FACT SHEET**

Page 11, the second to the last paragraph: The last sentence specified the monitoring frequency in error and was inconsistent with the frequency specified in the permit. For consistency, this sentence has been changed to read “The monitoring frequency will be once every two months, during the period September through May.”

Page 12, the last sentence of the fourth paragraph: The term “below its minimum quantitation level” will be replaced with “non-detected” for clarification purposes.

*The following modification has been made to the permit as requested by J. H. Baxter & Company.*

## **PERMIT**

An effluent limit of 1 mg/L and a monitoring requirement for copper will be added to this permit. This effluent limit, based on the ground water quality criterion for copper, applies to ground water discharges only. The facility has requested approval to use copper naphthenate as a treating solution for their poles. Depending on market demand, the facility hopes to treat a substantial number of poles with copper naphthenate in the future. *The facility voluntarily sought this amendment as part of the inclusion of a new process at the Arlington plant.*

### **S2.A Total Suspended Solids (TSS) (page 8 and 9)**

The Department has determined that it is not necessary to require J. H. Baxter to continue monitoring TSS in its stormwater as it ultimately infiltrates to the ground. The suspended solids information would not alter the effluent limits that have already been placed in the permit. The original rationale for this monitoring requirement was to serve as an indicator for the facility to change out the absorbent pads in the individual french drain catch basins, and to determine whether there is a correlation between suspended solids and pentachlorophenol (PCP). The french drain catch basins have already been closed. The Department has established that there is a correlation between solids and PCP. Therefore, there is no need to continue monitoring for this parameter. The TSS monitoring requirement for both treated wood and untreated wood storage areas is proposed to be removed from the permit.

### **S2.C Groundwater Monitoring (page 10)**

Monitoring wells MW10 and MW-15 will be added to this section of the permit. These wells were constructed under the RCRA cleanup Administrative Order issued by the EPA for the facility. The location of these two monitoring wells is downgradient of the groundwater flow toward northwest of the site. Therefore, it is relevant to require monitoring at these two wells.

### **S3.A Reporting and Recordkeeping Requirements**

DMR submittal dates will be changed from “December, March, June 30” to “January, April, July, and October 5<sup>th</sup> of each year.”

### **S5 Spill Plan (page 14)**

The term “update spill control plan” will be changed to read “updated spill prevention plan.”

S6.A Schedule of Compliance (page 14)

Line 3: The term “storage area resulting from the RI/FS study which was conducted under the MTCA Agreed Order” will be changed to read “storage area resulting from the cleanup activities which were conducted under the EPA Administrative Order on Consent (AOC), docket # RCRA-10-2001-0086.”.

The last sentence of the first paragraph which reads “a gradual inclined surface should be considered for the pavement design” will be removed.

Line 2 of the second paragraph: The term “MTCA Agreed Order” will be replaced with “EPA-AOC.”

**GENERAL INFORMATION**

The contact person will be changed from Ms. Georgia Baxter to Ms. RueAnn Thomas, Environmental Programs Director.

**PUBLIC NOTICES**

The proposed changes in this permit are considered to constitute a major modification under 40 CFR 122.62. Consequently, the draft permit modification is required to be published for a 30-day public review and comment period. This notice will be published in the *Everett Herald*. Issuance of the final modification is contingent upon the outcome of the public review and comment period.